ECOLOGY AND ENVIRONMENT, INC.

REGION VI

MEMORANDUM

REVIEWED BY (EACH) DATE 9-20-

TO: Dave Peters, Chief
Hazardous Waste Section

FROM: Imre Sekelyhidi, Env. Engineer

THRU: K. H. Malone, Jr. - RPM

NECHES BUTANE PRODUCTS CO.
TXD008063414

DATE: June 29, 1983

SUBJ: Reconnaissance Inspection of Uniroyal Chemical, Port Neches, TX (TX9881)
TDD # F-6-8211-2

In accordance with TDD # F6-8211-2 FIT made preparations for a reconnaissance inspection of the "Uniroyal" Site. It was found that no site was known under the name of "Uniroyal Chemical Co.", or (according to the PA attached to the TDD) as:
TX9881 "Neches Butane Products Co., Sara Jane Rd., Port Neches, TX 77651".

However, the Region VI Hazsit file folder contains a note: "Dupl. TX 2178, indicating an alias for the site. This site is TX2178 "Common Industrial Landfill, Orchard Avenue (1/4 mi n. of FM 365), Port Neches, TX 77651" (FIT prepared a PA for this site on 1/26/81). This file in turn referred to the following sites as being the same as TX2178.

TX 2186 "Neches Butane Products Co., P.O. Box 817, Port Neches, TX 77651", and TX 4774 "Common Landfill Site (B.F. Goodrich), Orchard Avenue, Port Neches, TX 77651".

In order to resolve the above duplicate listings for the site, the TDWR District VI office in Orange, TX was contacted and arrangements were made to visit the site. On January 5, 1983, a two member FIT, Imre Sekelyhidi and Larry Froebe, met with Mr. Michael Moore nd Mr. Tim Chaney at their Orange office. Discussions with TDWR District personnel and search of District VI files indicated that the "Neches Butane Product Co." site is identical to the site known as: TX 3038 "River Front Land, Old Pure Atlantic Road, Port Neches, TX 76651," or TX3038 "River Front Pit, Sara Jane Rd., Port Neches, TX 77651".

The former name ("River Front Land on Old Pure Atlantic Road") was listed on page 407 of the Eckhardt Report). Attachment #1, a copy of a computer record obtained from the District VI office lists: "The B. F. Goodrich Company, Chemical Group, SB Rubber Plant", "Neches Butane Products Company", and "Texas - U.S. Chemical Company" as disposers at the site.

On January 29, 1980, Melvin Swoboda of the District VI office conducted a Solid Waste Survey (attachment #2) of, what the district office had called, "Texaco River Front Site on Sara Jane Road" and established the above identities (TX 3038).

The survey established that the site (s) property was acquired by Texaco in 1969 and after this date it was no longer used as a waste disposal site. Prior to the acquisition of this land by Texaco, the site was owned by American Cyanamid and leased to B.F. Goodrich, Neches Butane, and Texas U.S. Chemicals, all of Port Neches, who used the site for disposal of Industrial Solid Wastes by incineration and landfill. Waste material disposed of included: furfural polymers, tower cleaning wastes, rubber residue, waste oil, API separator wastes, and building debris.

On April 10, 1980, the TDWR District VI office completed a PA for: TX 3083 "Texaco River Front Site, Sara Jane Road (off of Pure Atlantic Rd.), Port Neches, TX 77651" (Attachment #3).

There is no record in the EPA Region VI files under site number TX 3083.

On June 13, 1980, TDWR, Austin, TX, initiated enforcement action (attachment #4), and from that time on the site was handled as a state lead site by TDWR. A synopsis of subsequent events extracted from District VI files is attached (attachment #5).

Since the site is a state lead site, under on-going state enforcement procedures, and since no prior arrangements could possibly have been made with Texaco, owner of the site, for site entry, FIT terminated reconnaissance inspection activity.

FIT established that the subject request concerns the same site as listed under the following site numbers: TX 2178, TX 2186, TX 3038 and TX 4774.

It is recommended that all of the above hazsit files (including TX 9881) be reconciled and consolidated.

In view of the above, this TDD is considered complete.

/mm

SITE: NUMBER 3083 PAGE 1 FOR THIS SITE
RIVER FRONT LAND
OLD PURE ATLANTIC ROAD
PORT NECHES,TX 77651

COMPANY: COMPANY-FACILITY NUMBER 6011
THE B. F. GOODRICH COMPANY
CHEMICAL GROUP
SB RUBBER PLANT
1615 MAIN STREET
PORT NECHES,TX 77651
COMPOSITION OF WASTE:
ACID1
HEAVY1
ORGAN1
ORGAN13
ORGAN20 ORGAN22
INORG1 INORG2
MISC1

FIRST YEAR USED: 1959
LAST YEAR USED: 1969

HUNDRED TONS: .
THOUSAND CUBIC YDS.: .
THOUSAND GALLONS: .

COMPANY: COMPANY-FACILITY NUMBER 6012
NECHES BUTANE PRODUCTS COMPANY
X----
NECHES BUTANE PRODUCTS COMPANY
P.O. BOX 817, FM 366 AT SPUR 136
PORT NECHES,TX 77651
COMPOSITION OF WASTE:
ORGAN1
ORGAN22 ORGAN23
INORG1

FIRST YEAR USED: 1959
LAST YEAR USED: 1969

HUNDRED TONS: .
THOUSAND CUBIC YDS.: .
THOUSAND GALLONS: 1565

COMPANY: COMPANY-FACILITY NUMBER 48004
TEXAS-U.S. CHEMICAL COMPANY
X----
TEXAS-U.S. CHEMICAL COMPANY
1215 MAIN STREET
PORT NECHES,TX 77651
COMPOSITION OF WASTE:
ACID1
ORGAN1
ORGAN10
ORGAN14
ORGAN20 ORGAN22
INORG1 INORG2
MISC1 MISC3 MISC5

FIRST YEAR USED: 1959
LAST YEAR USED: 1969

HUNDRED TONS: 33
THOUSAND CUBIC YDS.: .
THOUSAND GALLONS: .

LEGEND: IF LISTED, THEN PRESENT IN WASTED. IF NOT LISTED, THEN ITEM NOT PRESENT, NOT KNOWN IF PRESENT, OR DATA MISSING.

40

ATTACHMENT #1

407-7

SITE: NUMBER 3083 PAGE 2 FOR THIS SITE
RIVER FRONT PIT
SARA JANE ROAD
PORT NECHES,TX 77651

COMPANY: COMPANY-FACILITY NUMBER 48005
NECHES BUTANE PRODUCTS COMPANY
X----
NECHES BUTANE PRODUCTS COMPANY
P.O. BOX 817, FM 366 AT SPUR 136
PORT NECHES,TX 77651
COMPOSITION OF WASTE:

FIRST YEAR USED: 1959
LAST YEAR USED: 1969

HUNDRED TONS: .
THOUSAND CUBIC YDS.: .
THOUSAND GALLONS: 3130

ORGAN1

INORG1

ORGAN22 ORGAN23

Key to abbreviations

Acid1= acids with pH < 3
Heavy1= Heavy & trace metals (bonded)
Inorg1= Inorganics
Inorg2= Salts
Organ1= Organics
Organ10= Amides, Amines, Imides
Organ13= Elastomers
Organ14= Solvents
Organ20= Oil & oil Sludges
Organ22= Alcohols
Organ23=Ketones & Aldehydes

407-7

LEGEND: IF LISTED, THEN PRESENT IN WASTED. IF NOT LISTED, THEN ITEM NOT PRESENT, NOT KNOWN IF PRESENT, OR DATA MISSING.

ATTACHMENT #2

Solid Waste Section File Copy

Texas Department of Water Resources

INTEROFFICE MEMORANDUM

TO: Gary Schroeder, Chief, Industrial Wastewater and Solid Waste, Enforcement and Field Operations

DATE: May 12, 1980

THRU:

FROM: Harry Boudreaux, Assistant District Supervisor

SUBJECT: Texaco's River Front Disposal Site, Port Neches--Enforcement Action Request

Attached are investigation reports which document apparent violations of the Texas Water Code and substantiate this request for enforcement action on Texaco, Inc. This site became known to the District 6 Office through the Waste Disposal Site Survey report done by the Subcommittee on Oversight and Investigations, chaired by Representative Bob Eckhardt.

Findings of the violations are as follows:

Violation	Data Source	Permit or Other Requirement
January 29, 1980	Solid Waste Disposal Site Survey, Potential Hazardous Waste Site Identification and Prehearing Assessment, Chain-of-Custody Tag Nos. SS05031, SS05014, SS05015, SS05039, SS05040 and SS05042.	Texas Water Development Board Rule 156.22.01.001-.014.006, General Prohibitions Texas Water Code, Chapter 26

Recommendations

Within 90 days Texaco, Inc. shall complete and submit to the Executive Director of the Texas Department of Water Resources the results of a study of the river front disposal site, designed to determine the amount and composition of material disposed in the site and any impact on ground and surface waters from the site.

Within 30 days after completion of the study Texaco, Inc. shall formulate and submit a plan for proper closure of the river front site or removal of all waste material to a secure industrial solid waste disposal facility.

Within 60 days after submission of the study Texaco, Inc. shall complete proper closure or removal of all waste material from the river front site.

Approved: Clarence W. Puritz

Signed: Harry Boudreaux

Attachment

SOLID WASTE DISPOSAL SITE SURVEY

Entity Name, Address and Registration No.
Texaco river front site (formerly owned by American Cyanamid), Sara Jane Road, Port Neches, Texas 77651 (page 407 Eckhardt Report)

Exact Location (include map):
South of Jefferson Chemical Co. off of Pure Atlantic Road on Sara Jane Road, approximately 0.5 miles east of Orchard Road (see attached map)

Affected Area (size in feet, yards, acres, etc.):
Approximately 7.9 acres total (approximately 1.5 acres in waste material)

Type Material Stored or Disposed (liquid, drums, etc., including chemical makeup if possible):
Liquids, futural polymer, tower cleaning wastes, paper and trash, building debris, rubber residue, waste oil and API separator wastes

Condition of Site (include any environmental hazards, if any):
The site is located in the marsh adjacent to the Neches River and was never covered or properly closed by the companies. Discharges from the two ponds occur during periods of wet weather and polymer has covered some areas around the edge of the site.

Possible Impact on Surface or Ground Water (if it can be determined):
Samples of the water and material at the site were collected to identify any problems. A sample from a shallow well located at the site was collected in order to determine any problems with ground water. It should be noted that the well is used by the residents of a mobile home located at the site (5 years) (see attached results of COC tags (qualitative only).

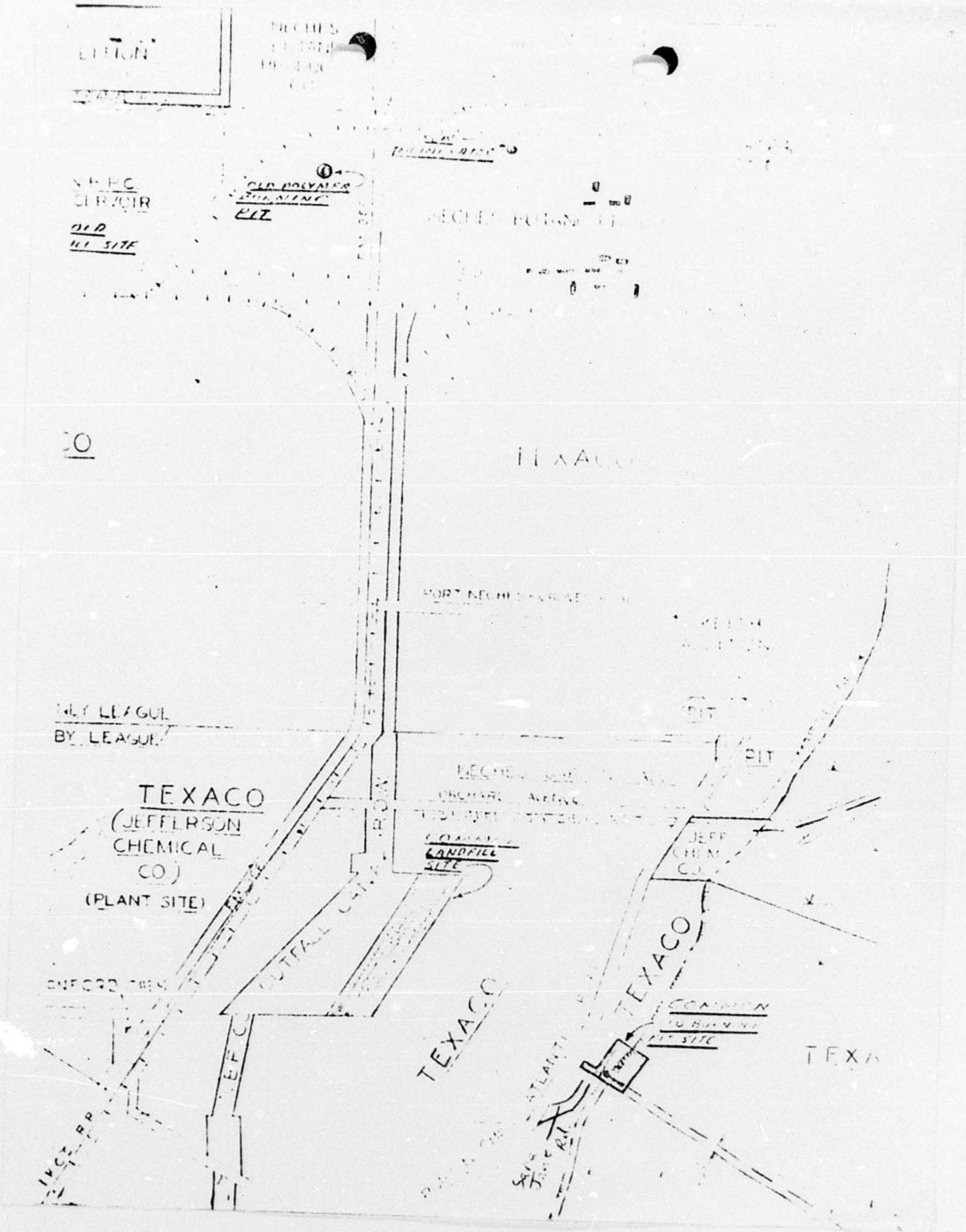
Comments (any other pertinent information including a representative photo):
Property owned by Texaco at present. Was owned by American Cyanamid at the time it became a waste site--used by entities listed below:
Neches Butane Products Co.
B. F. Goodrich, Inc.
Texas U.S. Chemicals

Approved (C. W. Moritz) Clarence W. Moritz

Name Bill Adsit
Bill Adsit

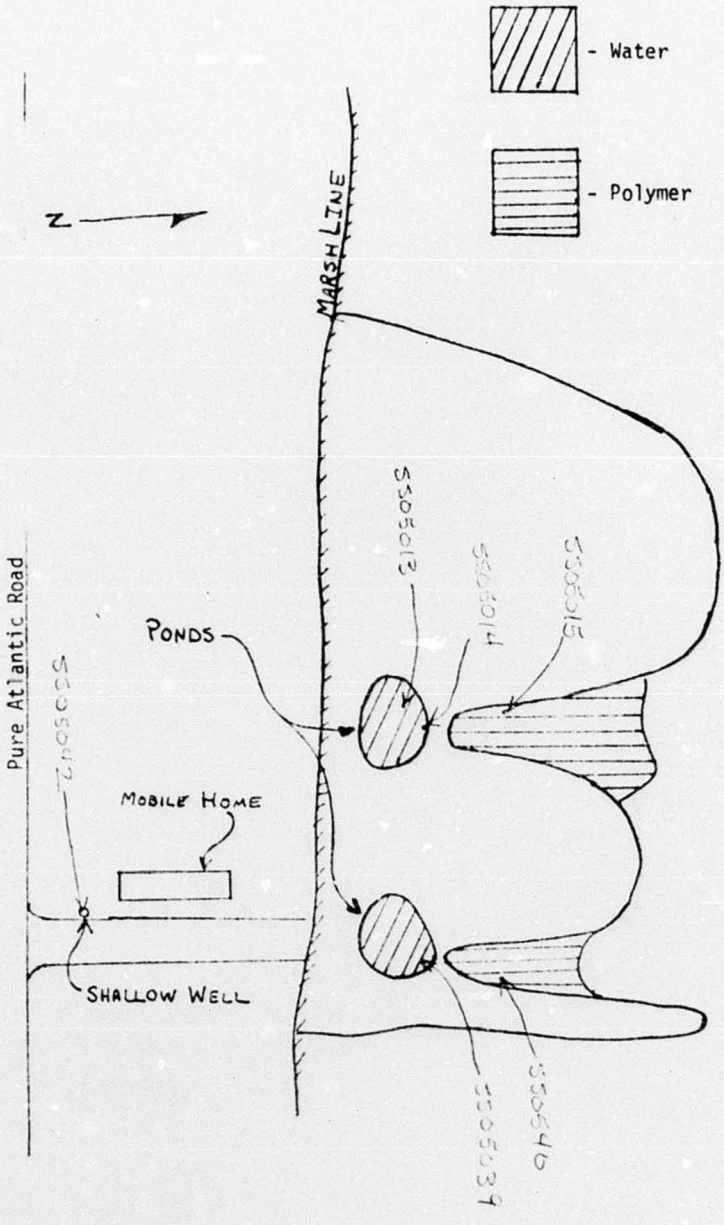
Date 4-9-80

0 0 5 4



OLD POLYMER BURNING PIT
CO
TEXACO
PORT NECHES
BY. LEAGUE
PIT
PIT
TEXACO
(JEFFERSON
CHEMICAL
CO.)
(PLANT SITE)
LANDFILL
SITE
JEFF
CHEM
CO
OUTFALL CANAL
TEXACO
TEXACO
TEXACO
TEXA

River Front Site



ATTACHMENT #3

TX-407-7

EPA POTENTIAL HAZARDOUS WASTE SITE IDENTIFICATION AND PRELIMINARY ASSESSMENT

REGION: 6 | SITE NUMBER (to be assigned by Hq): 3083

NOTE: This form is completed for each potential hazardous waste site to help set priorities for site inspection. The information submitted on this form is based on available records and may be updated on subsequent forms as a result of additional inquiries and on-site inspections.

GENERAL INSTRUCTIONS: Complete Sections I and III through X as completely as possible before Section II *(Preliminary Assessment)*. File this form in the Regional Hazardous Waste Log File and submit a copy to: U.S. Environmental Protection Agency; Site Tracking System; Hazardous Waste Enforcement Task Force *(EN-335)*; 401 M St., SW, Washington, DC 20460.

I. SITE IDENTIFICATION

A. SITE NAME: TEXACO- RIVER FRONT SITE

B. STREET *(or other identifier)*: SARA JANE ROAD (off of Pure Atlantic Rd

C. CITY: Port Neches

D. STATE: Texas

E. ZIP CODE: 77651

F. COUNTY NAME: Jefferson County

G. OWNER/OPERATOR *(If known)*

1. NAME: TEXACO/ JEFFERSON CHEMICAL CO. (Administator)
P.O. Box 847, Port Neches 77651

2. TELEPHONE NUMBER: 713/722-8381

H. TYPE OF OWNERSHIP

☐ 1. FEDERAL ☐ 2. STATE ☐ 3. COUNTY ☐ 4. MUNICIPAL ☑ 5. PRIVATE ☐ 6. UNKNOWN

I. SITE DESCRIPTION: Abandoned and improperly closed-out site within a marsh adjacent to the Neches R. and located on Sara Jane Rd. off of Pure Atlantic Rd. (approx. 0.5 miles E. of Orchard Ave.) Exhibits organicly contaminated storm water and protrusions of polymer & rubber at the surface.

J. HOW IDENTIFIED *(i.e., citizen's complaints, OSHA citations, etc.)*: Eckhardt List (pg. 407, #7)

K. DATE IDENTIFIED *(mo., day, & yr.)*: 12/14/79

L. PRINCIPAL STATE CONTACT

1. NAME: Texas Department of Water Resources — District 6, Orange, TX

2. TELEPHONE NUMBER: 713/883-2973

II. PRELIMINARY ASSESSMENT *(complete this section last)*

A. APPARENT SERIOUSNESS OF PROBLEM

☑ 1. HIGH ☐ 2. MEDIUM ☐ 3. LOW ☐ 4. NONE ☐ 5. UNKNOWN

B. RECOMMENDATION

☐ 1. NO ACTION NEEDED *(no hazard)*

☐ 2. IMMEDIATE SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR:
b. WILL BE PERFORMED BY:

☑ 3. SITE INSPECTION NEEDED
a. TENTATIVELY SCHEDULED FOR: Further inspections pending company response.
b. WILL BE PERFORMED BY: State/WA

☐ 4. SITE INSPECTION NEEDED *(low priority)*

C. PREPARER INFORMATION

1. NAME: William Adsit TDWR, District 6, Orange

2. TELEPHONE NUMBER: 713/883-2973

3. DATE *(mo., day, & yr.)*: 4/10/80

III. SITE INFORMATION

A. SITE STATUS

☐ 1. ACTIVE *(Those industrial or municipal sites which are being used for waste treatment, storage, or disposal on a continuing basis, even if intrequently.)*

☑ 2. INACTIVE *(Those sites which no longer receive wastes.)* Improper closure apparent.

☐ 3. OTHER *(specify)*: *(Those sites that include such incidents like "midnight dumping" where no regular or continuing use of the site for waste disposal has occurred.)*

B. IS GENERATOR ON SITE?

☑ 1. NO ☐ 2. YES *(specify generator's four-digit SIC Code)*:

C. AREA OF SITE *(in acres)*: Entire plot = 2.9 Approx. 2 acres

D. IF APPARENT SERIOUSNESS OF SITE IS HIGH, SPECIFY COORDINATES

1. LATITUDE *(deg.-min.-sec.)*: 29° 58' 39"

2. LONGITUDE *(deg.-min.-sec.)*: 93° 55' 20"

E. ARE THERE BUILDINGS ON THE SITE?

☑ 1. NO ☐ 2. YES *(specify)*: However, a residential trailer is < 100 yds away

T2070-2 (10-79)

Continue On Reverse

IV. CHARACTERIZATION OF SITE ACTIVITY — Past activity

Indicate the major site activity(ies) and details relating to each activity by marking 'X' in the appropriate boxes.

'X'	A. TRANSPORTER	'X'	B. STORER	'X'	C. TREATER	'X'	D. DISPOSER
						X	
	1. RAIL		1. PILE		1. FILTRATION	X	1. LANDFILL
	2. SHIP		2. SURFACE IMPOUNDMENT		2. INCINERATION		2. LANDFARM
	3. BARGE		3. DRUMS		3. VOLUME REDUCTION	X	3. OPEN DUMP
	4. TRUCK		4. TANK, ABOVE GROUND		4. RECYCLING/RECOVERY		4. SURFACE IMPOUNDMENT
	5. PIPELINE		5. TANK, BELOW GROUND		5. CHEM./PHYS. TREATMENT		5. MIDNIGHT DUMPING
	6. OTHER (specify):		6. OTHER (specify):		6. BIOLOGICAL TREATMENT	X	6. INCINERATION
					7. WASTE OIL REPROCESSING		7. UNDERGROUND INJECTION
					8. SOLVENT RECOVERY		8. OTHER (specify):
					9. OTHER (specify):		

E. SPECIFY DETAILS OF SITE ACTIVITIES AS NEEDED

Disposal site no longer active; characterization above pertains to past activities only, when owned by American Cyanamid and leased for disposal purposes to Neches Butane Products, B.F. Goodrich, and Texas- US Chemicals. Disposal activities beginning in 1959 and ceasing in 1969 allegedly include Mixed indust. landfill, drummed waste landfill, and incineration.

V. WASTE RELATED INFORMATION

A. WASTE TYPE

☐ 1. UNKNOWN ☑ 2. LIQUID ☑ 3. SOLID ☑ 4. SLUDGE ☐ 5. GAS

B. WASTE CHARACTERISTICS

☐ 1. UNKNOWN ☒ 2. CORROSIVE ☐ 3. IGNITABLE ☐ 4. RADIOACTIVE ☒ 5. HIGHLY VOLATILE
☐ 6. TOXIC ☐ 7. REACTIVE ☒ 8. INERT ☐ 9. FLAMMABLE
☐ 10. OTHER (specify):

C. WASTE CATEGORIES

1. Are records of wastes available? Specify items such as manifests, inventories, etc. below. * Waste Disposal Site Survey- Subcom. Oversight

Yes. Records were apparently available as per response to questionaire.*

2. Estimate the amount (specify unit of measure) of waste by category; mark 'X' to indicate which wastes are present.

a. SLUDGE	b. OIL	c. SOLVENTS	d. CHEMICALS	e. SOLIDS	f. OTHER
AMOUNT: Individual amounts unknown. See approximate total amounts below.					
UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE
X (1) PAINT, PIGMENTS	X (1) OILY WASTES	X (1) HALOGENATED SOLVENTS	X (1) ACIDS	(1) FLYASH	X (1) LABORATORY PHARMACEUT.
X (2) METALS SLUDGES	(2) OTHER (specify):	X (2) NON-HALOGNTD. SOLVENTS	(2) PICKLING LIQUORS	(2) ASBESTOS	(2) HOSPITAL
(3) POTW		X (3) OTHER (specify): Ketones & Aldehydes Alcohols	(3) CAUSTICS	(3) MILLING/ MINE TAILINGS	(3) RADIOACTIVE
(4) ALUMINUM SLUDGE			(4) PESTICIDES	(4) FERROUS SMLTG. WASTES	(4) MUNICIPAL
X (5) OTHER (specify): Oily sludges			(5) DYES/INKS	(5) NON-FERROUS SMLTG. WASTES	X (5) OTHER (specify): Salts Misc.
			(6) CYANIDE	X (6) OTHER (specify): Polymers Elastomers Rubber	
			(7) PHENOLS		
			(8) HALOGENS		
			(9) PCB		
			X (10) METALS		
			(11) OTHER (specify): Amides, Amines		

ALL CATEGORIES COMBINED= 3,300 tons & 4,695,000 gallons +

 Continue On Page 3

Continued From Page 2

V. WASTE RELATED INFORMATION (continued)

3. LIST SUBSTANCES OF GREATEST CONCERN WHICH MAY BE ON THE SITE (place in descending order of hazard).
The following substances were qualitatively detected in water samples taken from standing water on the site, using GC, IR, and Mass Spec.: Diacetone alcohol, acetone, organic acid, Triisobutylene, indene,Xylene, Tetraisobutylene, ethyl benzene, vinyl cyclohexane, and Butadiene-Styrene Polymers. Water,analyzed in the same fashion, taken from a residential well 25 m.south of the site produced no peaks.However, the well is up-dip of the site and its depth unknown.

4. ADDITIONAL COMMENTS OR NARRATIVE DESCRIPTION OF SITUATION KNOWN OR REPORTED TO EXIST AT THE SITE.
Past, unlawful, public dumping is evident at the site. No known or reported incidents concerning this site have occurred although the property is leased to pasture cattle and the residents whos well was sampled have been there for five years.

VI. HAZARD DESCRIPTION

A. TYPE OF HAZARD	B. POTENTIAL HAZARD (mark 'X')	C. ALLEGED INCIDENT (mark 'X')	D. DATE OF INCIDENT (mo., day, yr.)	E. REMARKS
1. NO HAZARD				
2. HUMAN HEALTH	X			Actual hazard not established
3. NON-WORKER INJURY/EXPOSURE	X			" " " " "
4. WORKER INJURY				
5. CONTAMINATION OF WATER SUPPLY				
6. CONTAMINATION OF FOOD CHAIN	X			" " " " "
7. CONTAMINATION OF GROUND WATER	X			" " " " "
8. CONTAMINATION OF SURFACE WATER	X		1/29/80	Verified by IR,GC,& Mass Spec.
9. DAMAGE TO FLORA/FAUNA	X			Degree not established
10. FISH KILL	X			Actual hazard not established
11. CONTAMINATION OF AIR				
12. NOTICEABLE ODORS	X		4/9/80	
13. CONTAMINATION OF SOIL	X		" "	Visually evident
14. PROPERTY DAMAGE				
15. FIRE OR EXPLOSION				
16. SPILLS/LEAKING CONTAINERS/ RUNOFF/STANDING LIQUIDS	X			Surface runoff to marsh
17. SEWER, STORM DRAIN PROBLEMS				
18. EROSION PROBLEMS				
19. INADEQUATE SECURITY	X			Actual hazard not established The site is fenced off
20. INCOMPATIBLE WASTES				
21. MIDNIGHT DUMPING				
22. OTHER (specify):				

Continued From Front

VII. PERMIT INFORMATION

A. INDICATE ALL APPLICABLE PERMITS HELD BY THE SITE.

N/A

☐ 1. NPDES PERMIT ☐ 2. SPCC PLAN ☐ 3. STATE PERMIT (specify) _____

☐ 4. AIR PERMITS ☐ 5. LOCAL PERMIT ☐ 6. RCRA TRANSPORTER

☐ 7. RCRA STORER ☐ 8. RCRA TREATER ☐ 9. RCRA DISPOSER

☐ 10. OTHER (specify): _____

B. IN COMPLIANCE?

☐ 1. YES ☐ 2. NO ☐ 3. UNKNOWN N/A

4. WITH RESPECT TO (list regulation name & number) _____

VIII. PAST REGULATORY ACTIONS

☑ A. NONE ☐ B. YES (summarize below)

IX. INSPECTION ACTIVITY (past or on-going)

☐ A. NONE ☑ B. YES (complete items 1, 2, 3, & 4 below)

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION
Initial identifi.	1/29/80	State/MS	Site located and sampled
Pre. Assessment & in.	4/9/80	State/MS, WA	Site inspect. to set priority

X. REMEDIAL ACTIVITY (past or on-going)

☑ A. NONE In past ☐ B. YES (complete items 1, 2, 3, & 4 below) Future Activity pending

1. TYPE OF ACTIVITY	2. DATE OF PAST ACTION (mo., day, & yr.)	3. PERFORMED BY: (EPA/State)	4. DESCRIPTION

NOTE: Based on the information in Sections III through X, fill out the Preliminary Assessment (Section II) information on the first page of this form.

Solid Waste Section File Copy

ATTACHMENT #4

TEXAS DEPARTMENT OF WATER RESOURCES
1700 N. Congress Avenue
Austin, Texas

TEXAS WATER DEVELOPMENT BOARD
Louis A. Beecherl, Jr., Chairman
John H. Garrett, Vice Chairman
George W. McCleskey
Glen E. Roney
W. O. Bankston
Lonnie A. "Pete" Pilgrim

Harvey Davis
Executive Director

TEXAS WATER COMMISSION
Felix McDonald, Chairman
Dorsey B. Hardeman
Joe R. Carroll

June 13, 1980

Mr. G. E. Babbitt, Manager
Port Arthur Area - Texaco, Inc.
Port Arthur Refinery
P. O. Box 712
Port Arthur, Texas 77640

Dear Mr. Babbitt:

Re: Inactive Solid Waste Site (River Front Site), Port Neches, Texas

We have recently become aware of the existence of the above-referenced River Front disposal site through the Waste Disposal Site Survey prepared by the Subcommittee on Oversight and Investigation, chaired by Representative Bob Eckhardt. According to the information gathered by the Subcommittee, this site was owned by American Cyanamid Company while it was active, from 1959 to 1969. American Cyanamid, who is now wholly owned by Texaco, leased the property to the B.F. Goodrich Company, Neches Butane Products Company, and Texas - U.S. Chemical Company, all of Port Neches. These companies used the property to landfill and incinerate industrial solid wastes. In 1969, Texaco acquired the property after it was no longer in use as a disposal site.

On January 29, 1980, the site was inspected by Melvin Swoboda of our District 6 office. This inspection revealed that the site was never properly closed out, thus allowing contaminated runoff to enter the surrounding marshlands and raising the possibility of ground water contamination.

We request that representatives of Texaco, B.F. Goodrich, Neches Butane and Texas - U.S. Chemical meet with our staff to discuss the proper closure of the site. A conference has been scheduled for this purpose at 9:30 a.m., Monday, June 23, 1980, in Room 513-E, Stephen F. Austin State Office Building,

Texaco - River Front Site

1700 North Congress Avenue, Austin, Texas. Any questions regarding this matter should be directed to Ms. Kathy Upshaw of our Industrial Compliance Unit in Austin at a.c. 512/475-6371.

Sincerely yours,

Harvey Davis
Executive Director

ccs: Mr. D. T. Boumans, Plant Manager
B.F. Goodrich Company, Chemical Division
Mr. Harry E. Gardiner, Vice President & General Manager
Neches Butane Products Company
Mr. Hyman Norsworthy, Plant Manager
Texas - U.S. Chemical Company
✓ Texas Department of Water Resources, District 6 Office
Attention: Mr. Bill Adsit

ATTACHMENT #5

SYNOPSIS

OF SELECTED TDWR DOCUMENTS FROM DISTRICT 6 FILES

9/16/80 MEMO FROM TDWR TO D. BRUCE POPE, TEXACO; RE: INACTIVE SOLID WASTE SITE (RIVER FRONT SITE) MEETING OF AUG 1, 1980. MEMO REQUESTS REVISED CLOSURE PLAN BY OCTOBER 15, 1980.

~~9/12~~ 9/9/81 MEMO FROM TDWR TO GAYLE D. EDWARDS, TEXACO; RE: TEXACO INC., SARA JANE RD. SITE. MEMO EXTENDS DETAILED CLOSURE PLAN DEADLINE TO OCTOBER 31, 1981

10/29/81 LETTER FROM J. F. COOPER, TEXACO CHEMICAL CO., TO HARVEY DAVIS, EXECUTIVE DIRECTOR, TDWR; RE: SUBMITTAL OF CLOSURE PLAN, RIVERFRONT PROPERTY, PORT NECHES. ~~HAS~~ (COPY OF SUMMARY OF CLOSURE PLAN ATTACHED)

CC: TO MR. N. F. MC LEOD, DYNAPOL, INC., P.O. BOX 667, PORT NECHES, TX 77651 AND MR. D. J. BOUMANS, B. F. GOODRICH CO., P.O. BOX 697, PORT NECHES, TX 77651

5/12/81 MEMO FROM TDWR TO SAM LISTIAK, TEXACO; RE: INACTIVE SOLID WASTE SITE (RIVER FRONT SITE). MEMO REQUESTS DETAILED CLOSURE PLAN WITHIN 120 DAYS.

1/5/82 (MIS-DATED 1/5/81) MEMO FROM DAN SHEPPERS, CENTRAL OFFICE TO FILE ON TELECON TO DAVID BUCHANAN, TDWR, AUSTIN; RE: MONITORING WELL. MEMO ADVISES THAT MONITORING WELL TO BE USED WILL NOT BE DRINKING WATER WELL.

5/24/82 Letter from R. G. Brown, Texaco, to Bryan W. Dixon, P.E., TDWR, Austin; Re: Initial Sample Results. Letter indicates TOC 11 mg/l, pH 6.5.

6/3/82 Texaco Chemical Co., River Front Site, Sara Jane Rd. Inspection Report By Tim Chaney, TDWR, District 6; Work No. 9114; "Permit not required." Inspection was on 5/20/82.

11/9/82 Memo from Gary D. Schroeder to Harry Boudreaux; Re: Ground Water Data Submittal. Memo requests to monitor ground water data submittal for Texaco RiverFront site for two years, beginning May 1982.

COPY FROM ATTACHMENT TO 10/29/81 LETTER.

The Riverfront Burning Pit Site is located on the Neches River (north) side of the Old Pure-Atlantic Highway, also known as Sara Jane Road, just east of Port Neches, Texas. It is contained in a 2.9 acre area on the marsh side of a bluff line that parallels the river.

The area containing the subject site was acquired by Texaco from American Cyanamid in 1975. The site was used as an open pit burning area by BFGoodrich, Texas-U. S. Chemical Company and Neches Butane Products Company from 1959 through 1969. The area has been idle since that time. It is located within a U. S. Corps of Engineers dredge spoil area that is used as a containment area for dredge spoil from the Neches ship channel.

Texaco, with assistance from BFGoodrich and SYNPOL, proposes to make improvements as detailed in the following:

Closure Plan

I. General Plan

The two pits are to be emptied of their elastomer waste and backfilled with dirt. The two sloughs will be covered with MIRAFI 500 cloth and then covered with clay. The site is to be covered with dirt and replanted. Grading is to take place to cover waste, to prevent ponding of water and to maintain continuity of the site.

II. Detailed Plan

A. Pit Site

1. Clear area to be worked of obstruction (trash, rubble, weeds, grasses, etc.). The cleared obstructions may be placed in bottom of the pits before backfilling.

2. Remove all elastomer and badly contaminated soil from the two pits. Pit #1; diam = 55', vol = 880 yd^3. Pit #2; diam = 85', vol = 2100 yd^3.

3. Backfill pits with clay soil (3000 yd^3 unexpanded, 4050 yd^3 expanded).

4. Cover elastomer in the sloughs and fans with 12,000 ft^2 of MIRAFI 500 or its equivalent.

5. Cover the now fabric-covered elastomer in the sloughs and their "fans" with clay soil. Clay soil depth is to be 3 feet in slough proper, a minimum of 1 foot on top of fans, and finally sloping into the marsh.

A. Pit Site (cont'd.)

6. Finish final grade over work site such that:

a) Continuity of site is maintained
b) No ponding of water takes place
c) All waste is covered
d) Grade does not abruptly enter the marsh
e) Minimum depth of soil covering is to be 6 inches (1200 yd^3 unexpanded, 1700 yd^3 expanded)

7. Plant a proper cover at the finished site to prevent soil erosion.

B. Landfill Site

1. Transport elastomer and waste soil from Part A Step 2 to the BFG common landfill site.

Machinery and trucks used to load, unload and transport the elastomer will most likely require polyethylene liner/covering to ease unloading and cleaning.

2. Excavate 4* cells (75' long x 30' wide x (12' deep) that meet all requirements of the BFG site for the burial of elastomer waste.

3. Fill each cell with 1/4 waste obtained in Part A Step 2 (750 yd^3 per cell).

4. Cover waste in each cell with MIRAFI 500 or equivalent (250 yd^3/cell, 1000 yd^2 total).

5. Bury waste and fabric with clay soil to depth of at least 3'. (250 yd^3 unexpanded/pit, total cover volume of 1000 yd^3 unexpanded.)

6. Dispose of any excess soil as required. (May be used in Steps 3 and 5 of Part A).

III. Post Closure

Obtain a water sample every three months from an existing well located up-dip from the site. Report the TOC, mg/l, and pH results on the sample to the Texas Department of Water Resources quarterly. Unless extended by request of the TDWR, this requirement will expire two years from the date of closure.

Note: Fewer cells of larger capacity may be used. In that case, the requirements of steps 2-5 will be adjusted to give equivalent results. It is recommended that the size of the cell(s) not exceed the reach capability of the dragline used to place initial soil cover on top of the fabric cover.

catchall
limit depth of cells

Photographer / Witness
IMRE SEKELYHIDI / LARRY FROEBE

Date / Time / Direction
1/5/83 / 2:00 PM / NORTH

Comments:
ENTRANCE GATE TO TEXACO-
RIVER FRONT SITE. NOTE
"NO TRESPASSING" NOTICES.

ATTACHMENT #6
PG 1 OF 2

Photographer / Witness
IMRE SEKELYHIDI / LARRY FROEBE

2, 3

Date / Time / Direction
1/5/83 / 2:00 PM / NORTH

Comments:
ENTRANCE ROAD TO TEXACO-
RIVER FRONT SITE AS VIEWED
FROM THE ENTRANCE GATE.